



**SWIFT ENERGY NEW ZEALAND LTD.**

28 September 2007

Gas Industry Company  
PO Box 10-646  
WELLINGTON

Attn: Ian Dempster  
Senior Advisor – Wholesale Markets

Dear Ian

**Submission on access to gas processing facilities**

As you are aware, Swift Energy New Zealand Limited (“Swift”) has now signed the standard Information Disclosure agreement, and we hope you are successful in obtaining similar sign-off by all other Facility Owners.

Throughout the process relating to access to gas processing facilities, Swift has supported the approach adopted by Gas Industry Company (“GIC”), and we continue to support the drive towards a flexible, light-handed, information disclosure regime. As stated, we would prefer for this to be an industry-led voluntary scheme, but if this is not possible, then we acknowledge and accept that GIC will need to regulate for the provision of information.

Swift broadly concurs with the conclusions in the GIC Statement of Proposal document, dated September 2007. We particularly agree with the reports that there is no evidence of inefficiency in the gas processing market. As we have advised GIC, Swift has successfully concluded a number of contracts relating to the use of our facilities. In addition, we have recently adopted the internationally-recognised Jumping Pound (JP-05) methodology to structure our facilities agreements.

Given the absence of inefficiency in the gas processing market, it is appropriate that the form of disclosure, and the rules governing such disclosure, remain flexible and not overly prescriptive to ensure that:

- Compliance time and costs are minimized; and
- Facility owners are assisted in making submissions that are appropriate for their specific circumstances.

As such, if a regulated approach is required, Swift supports the draft information disclosure rules contained in Appendix B of the Statement of Proposal, as we believe that they are well-aligned with the above objectives.

If you would like to discuss this matter further, please do not hesitate to contact me or Alan Cunningham.

Yours sincerely

Tony Bissell  
Director – Commercial Services